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The Honorable Katherine Polk Failla  
United States District Court, Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

October 18, 2022

**RE: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*,  
No. 17-cv-6221 (KPF) (SLC)**

Dear Judge Failla:

Defendants respectfully request leave to file under interim seal their reply in support of their Objections to Magistrate Judge Cave's Report and Recommendation, and to file a motion to seal along with proposed redacted copies and highlighted copies by November 11, 2022. Plaintiffs consent to this request.

Your Honor previously ordered the parties to follow this procedure for the sealing and redaction of prior rounds of briefing on Plaintiffs' pending motion for class certification (ECF No. 408 at 2). Defendants' filing of their Objections to Judge Cave's Report and Recommendation and Plaintiffs' filing of their Response to Defendants' Objections were also made in accordance with this procedure. (ECF Nos. 575, 578, 591, 592; *see also* ECF Nos. 494, 497, 511, 512.) Defendants respectfully submit that the same procedure should apply to Defendants' reply, which contains references to materials designated as Highly Confidential or Confidential pursuant to the Protective Order in this case. (ECF No. 150.)

Respectfully submitted,

s/ Robert D. Wick

Robert D. Wick

*Counsel for the JPMorgan Defendants*

Application GRANTED. Defendants shall file their reply along with proposed redacted and highlighted copies by **November 11, 2022**. The Court understands that the response will be viewable by the Court and parties only. The Clerk of Court is directed to terminate the motion at docket entry 611.

Dated: October 18, 2022 SO ORDERED.  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE